

4.8 Hazards and Hazardous Materials

This section describes the existing hazards and hazardous materials conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed San Diego State University (SDSU) Mission Valley Campus Master Plan Project (proposed project).

Documents Reviewed for Analysis

The analysis for this section is based on information from the following documents:

- 2015 Phase I Environmental Site Assessment prepared by AECOM (Appendix 4.8-1),
- 2019 Hazards and Hazardous Materials Technical Report prepared by Geosyntec Consultants (Appendix 4.8-2),
- 2019 Report of Environmental Investigation prepared by Group Delta Consultants Inc. (Appendix 4.8-3),
- 2019 Asbestos, Lead-Based Paint, and Universal Waste Survey prepared by Aurora Industrial Hygiene (Appendix 4.8-4), and
- 2019 Limited Soil and Groundwater Investigation Along Fuel Pipeline report prepared by Group Delta Consultants Inc. (Appendix 4.8-5).

Summary of Notice of Preparation Comments

A Notice of Preparation (NOP) was circulated from January 19, 2019, to February 19, 2019. A total of 150 letters were received during this comment period (Appendix 1-1). Hazard and hazardous material comments on the NOP focused on the following areas:

- potential impacts from previously contaminated soil and groundwater due to historical spills at the Kinder Morgan Energy Partners Mission Valley Terminal (MVT) north of the project site, as well as safety of development in proximity to the MVT facility; and
- potential impacts to established emergency evacuation plans.

4.8.1 Existing Conditions

4.8.1.1 Environmental Setting

The project site is located on approximately ~~172~~173 acres of land within the Mission Valley Community of the City of San Diego (City) (refer to Figure 2-4, Project Site and Surrounding Land Uses, in Chapter 2, Project Description, of this environmental impact report [EIR]). The project site is approximately 5 miles from downtown San Diego and approximately 2.5 miles west of the existing SDSU main campus situated along Interstate (I) 8 within the College Area Community of the City of San Diego. Adjacent land uses include Friars Road to the north, I-15 to the east, I-8 to the south, and Fenton Marketplace shopping center to the west. The Kinder Morgan Energy Partners MVT¹ facility, located at 9950 and 9966 San Diego Mission Road, abuts the northeastern boundary of the project site. Bulk fuel storage operations have occurred at the MVT since the early 1960s. A 10-inch-diameter underground pipeline that

¹ The Kinder Morgan Energy Partners MVT facility is also referred to as on-Terminal in several remediation documents. The project site is referred to as off-Terminal.

transmits fuel products from MVT to the San Diego Harbor runs north–south along the eastern project site boundary, partially within the project site. Topography generally slopes from east to west and north to south. The existing stadium structure is elevated to direct surface flows away from the stadium structure.

The project site is underlain by fill soils placed during grading for stadium construction in 1966, Quaternary alluvial flood-plain deposits, and the Friars Formation. The fill material used at the project site was primarily derived from the Stadium Conglomerate (clayey sand and gravel) and some of the underlying Friars Formation. Fill thickness is estimated to range up to 35 feet at the project site (Appendix 4.8-2). For further information, please refer to Section 4.6, Geology and Soils.

Multiple environmental investigations and remedial activities have occurred at the project site related to releases of petroleum hydrocarbons, primarily from MVT. As a result of these investigations, more than ~~100 groundwater monitoring wells, extraction wells, and soil vapor monitoring probes~~ 300 wells have been installed at the project site, including well boxes, concrete vault boxes, and over 3,000 feet of PVC underground piping that connects wells located across the site, from near the San Diego River to the northwestern portion of the stadium property, to MVT. The Regional Water Quality Control Board (RWQCB) has approved decommissioning some of the monitoring and extraction wells and soil vapor monitoring probes, and these wells are reportedly scheduled to be decommissioned in late 2019 or early 2020. Only a few sentinel wells will reportedly remain near the northeastern boundary of the project site in order to monitor the progress of ongoing remediation at the MVT property, and to confirm that contaminants from the MVT property are no longer migrating onto the project site (Appendix 4.8-2). As of July 2019, dozens of monitoring wells, extraction wells, and soil vapor monitoring probes remain on the project site.

4.8.1.2 Current Site Uses

The project site includes three existing uses as shown on Figure 2-3: (1) a multipurpose stadium (San Diego County Credit Union [SDCCU] Stadium) with an existing capacity of approximately 70,000 seats for football and other events, as well as other outlying buildings, maintenance, and storage facilities associated with athletic and stadium activities; (2) an associated surface parking lot with 18,870 parking spaces; and (3) the existing San Diego Trolley Stadium Station, accessible via the Green Line, which traverses the southern part of the project site. Two Metropolitan Transit System–owned and operated transformer buildings are present in the southeast and southwest portions of the project site. A cellular tower owned by Sprint is also located on the project site. As noted above, monitoring wells, extraction wells, and soil vapor monitoring wells also remain on site.

4.8.1.3 Historical Site Uses

Historically, the project site was part of the Guglielmetti Dairy from 1909 through the late 1940s and continued to be used for agriculture, including cultivation of row crops and pastureland, through the mid-1960s. Construction of the San Diego Stadium (currently SDCCU Stadium) began in the mid-1960s, resulting in the channelization of the San Diego River to the south of the project site. The stadium opened in 1967, with notable upgrades/expansions occurring in 1983 and 1997 (Appendix 4.8-2).

4.8.1.4 Previous Environmental Investigations

Dudek reviewed the available environmental investigations completed for the project site, as listed above in Documents Reviewed for Analysis; these documents are included as Appendices 4.8-1 through 4.8-5. The following is a summary of the known current or past environmental hazardous waste and/or materials conditions on the project site, based on the findings of these investigations.

Kinder Morgan Energy Partners Mission Valley Terminal

Between 1987 and 1991, there was an unauthorized release of approximately 200,000 gallons of gasoline from the MVT facility. The resulting groundwater contamination plume migrated southward, ultimately impacting the project site. Extensive investigations and remediation have occurred both on the MVT site and on the project site under Cleanup and Abatement Order (CAO) 92-01 issued by the San Diego RWQCB. In July 2016, the San Diego RWQCB concluded that the off-Terminal remediation had achieved the objectives stated in the cleanup order, and approved discontinuance of site remediation and post-remediation monitoring activities. Specifically, on July 15, 2016, the San Diego RWQCB issued Addendum No. 8 to CAO 92-01, which states,

groundwater and remediation monitoring are no longer necessary in the off-Terminal² area because the alternative groundwater cleanup levels have been attained . . . the dischargers installed a hydraulic containment barrier utilizing extraction wells RW-35, RW-36, and RW-37 to prevent petroleum hydrocarbon waste constituents in groundwater beneath the terminal from migrating beyond the MVT property limits . . . and continued monitoring of sentinel wells (T-11, R-10, R-43AS-AD, R-79AS-AM-AD, and R-87AS) is necessary to evaluate hydraulic containment effectiveness near the property boundary.

In addition, with the exception of the five sentinel wells, Addendum No. 8 requires “all off-Terminal wells and borings installed for the purpose of investigating, remediating, and monitoring the unauthorized off-Terminal pollution must be properly destroyed or transferred in accordance with applicable local and State requirements.”

A copy of Addendum No. 8 to CAO 92-01 is provided as Appendix 4.8-6. An abandonment permit, valid June 26, 2019, through October 24, 2019, was issued by the County of San Diego (County) for destruction of the remaining 318 wells (not including the sentinel wells). ~~Therefore, the remaining wells should have been scheduled to be removed before October 2019.~~ A copy of the permit is included as Appendix 4.8-7. Four of the five sentinel wells to remain as stipulated in Addendum No. 8 are located on the project site in the northeastern corner of the parking area, near San Diego Mission Road, as shown on Figure 4.8-1, Project Site Hazards. The fifth well, R-43AS-AD, is located on the northern side of San Diego Mission Road, north of the project site. The Geosyntec report indicates the sentinel wells will continue to be monitored, and although further monitoring and remediation is no longer required, it is possible that residual contamination not previously identified during the investigations may be encountered in the future (Appendix 4.8-2).

The 2019 investigation conducted by Group Delta (Appendix 4.8-3) states that petroleum contamination was not present in soil above Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) Note 3 or U.S. Environmental Protection Agency (EPA) regional screening levels (RSLs) (whichever was lower). Diesel-range hydrocarbons were detected in groundwater at concentrations between 55 and 240 micrograms

² Refers to the portion of the groundwater contamination plume that extends onto the project site.

per liter ($\mu\text{g/L}$). The Group Delta report states there are no state or federal maximum contaminant levels for diesel-range hydrocarbons. However, the concentration of $240 \mu\text{g/L}$ is above the Tier 1 environmental screening level (ESL) of $100 \mu\text{g/L}$ for residential use (SFBRWQCB 2019).³ The ESLs include screening levels for petroleum hydrocarbons in soil and groundwater in the State of California and are referenced by DTSC and San Diego Department of Environmental Health as they are the only current screening levels that include fuel hydrocarbons. Gasoline-range hydrocarbons and volatile organic compounds (VOCs) were detected in soil gas; benzene, ethylbenzene, and methyl tert-butyl ether were detected in soil gas samples at concentrations exceeding the EPA Vapor Intrusion Screening Levels (VISLs).

Former Underground Storage Tanks

The 2015 Phase I Environmental Site Assessment (Appendix 4.8-1) identified four former underground storage tanks (USTs) that were installed on the project site, all of which have been removed. All of the USTs were located in the southwestern portion of the project site, near the maintenance buildings.

One of the former USTs was removed in 1991. The AECOM report states that “although the UST was removed and the case was closed, it does not appear that soil samples were collected below any associated fuel dispensers or underground piping or if underground piping associated with the UST was removed and properly disposed.” This UST was reportedly located near the pesticide building in the southwestern corner of the project site.

The AECOM report also identified a historic leaking UST (LUST) as found in the Environmental Data Resources Records Search conducted for the phase I environmental site assessment. The LUST was reportedly active in 2006 and 2007. No additional information was obtained. AECOM requested regulatory files from the San Diego County Department of Environmental Health (DEH); no records of a LUST were identified. Dudek conducted a review of the State Water Quality Control Board GeoTracker database (GeoTracker 2019) and the California Environmental Protection Agency Regulated Site Portal (CalEPA 2019) and did not find any information regarding a LUST at the project site.

Other Soil and Groundwater Contamination

The reports reviewed each summarize various findings of contamination in soil and groundwater on the project site, including contamination from the MVT site as listed above, jet fuel-contaminated soil and groundwater discovered during installation of the transformer building in the southeastern portion of the project site (Appendix 4.8-2), and ~~three~~ two tanker truck rollovers which occurred at the intersection of San Diego Mission Road and Mission Village Drive.

Jet fuel-impacted soil and groundwater were reportedly encountered in 1995 in the southeastern area of the project site during the installation of the foundation for the Metropolitan Transit System Trolley line transformer building. A spill report indicated approximately 1,000 gallons of dissolved jet fuel mixed with water was encountered during dewatering activities associated with construction activities. Impacted water and contaminated soil encountered during construction activities were reportedly containerized and shipped off site. In 2019, Group Delta Consultants conducted a limited soil and groundwater investigation near the fuel pipeline to screen for potential soil and groundwater contamination associated with any pipeline leakage (Appendix 4.8-5). No field evidence of

³ The ESLs provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESL documents are prepared by staff of the San Francisco Bay RWQCB, but have been used on a variety of sites under regulatory guidance throughout the state of California. Information provided in these documents is not intended to establish policy or regulation.

VOC-impacted soil was observed during the investigation. Although some low residual total petroleum hydrocarbons (THP) concentrations were detected in the soil and groundwater samples, none of the concentrations exceeded applicable screening levels. No VOCs were detected in soil or groundwater samples except for acetone in one soil sample at a low concentration significantly below the RSL. Based on the investigation, no evidence of a fuel pipeline leak was observed.

As to tanker truck rollovers, one truck rollover, which occurred in April 2013, resulted in the release of approximately 3,500 gallons of ethanol into soil and groundwater. Various environmental investigations, including multiple soil sampling events, subsequently occurred to delineate potential impacts. It was determined that ethanol impacted a localized area of shallow groundwater in the vicinity of the spill, and that aerobic and/or anaerobic degradation processes mitigated groundwater impacts via natural attenuation (Appendix 4.8-2). Based upon the soil and groundwater sampling data presented, the DEH determined no further action was warranted to delineate or remediate subsurface impacts associated with the ethanol spill. The case was closed in February 2014.

In December 2005, a tanker truck containing gasoline overturned at the southeast corner of Mission Village Drive and San Diego Mission Road, resulting in a gasoline spill and fire; impacts from the release were investigated and remediated under the direction of the DEH and the case was granted closure in 2007. A tanker truck rollover occurred at the corner of Mission Village Drive and San Diego Mission Road on June 20, 2019. The rollover reportedly resulted in 40 to 60 gallons of ethanol released onto the street and stadium parking lot on the project site (Avitabile 2019).

As discussed above, Group Delta conducted an environmental investigation in 2019. The investigation did not identify petroleum contamination in soil above DTSC HERO Note 3 or RSLs. Further, VOCs, polycyclic aromatic hydrocarbons, and pesticides were infrequently detected at low concentrations below the RSLs. However, Dudek notes that diesel detected in groundwater as reported by Group Delta was above the San Francisco Bay RWQCB RSL referenced above. However, groundwater sampling was limited to the northeast corner of the project site, near the MVT facility. It is, therefore, possible that remaining unidentified contamination may be present in groundwater beneath the project site due to historical releases, in addition to the slightly elevated groundwater contamination.

The Group Delta investigation identified arsenic in soil in one location slightly above the published background concentration of 12 milligrams per kilogram (mg/kg) for Southern California. The detection of 12.1 mg/kg was identified in surface soils in the northeastern portion of the project site.

Asbestos, Lead-Based Paint, and Universal Wastes

Aurora Industrial Hygiene conducted a survey of hazardous building materials in the stadium and outlying buildings on the project site (Appendix 4.8-4). The survey included the stadium, maintenance building, blue shed building, garage, bathroom building, front guard shack, guard shacks A and B, ACE parking building, four bunker buildings, Brazilian Futbol Academi building, and the Sprint cell phone tower and building. The survey did not include the trolley station or associated structures. Approximately 600 samples were collected of suspect asbestos-containing materials, in-situ testing was conducted for suspect lead-containing materials, and an inventory of universal waste was compiled. Multiple areas within the stadium tested positive for asbestos, as well as materials in the bunkers, the bathroom building, the ACE parking building, and the garage. Multiple areas within the stadium also tested positive for lead-based paint and lead-containing components (i.e., non-painted materials with greater than or equal to 1.0 milligram per square centimeter of lead). No outlying structures had materials that tested positive for lead. Universal wastes identified on the project site include lights, self-illuminating exit signs, fluorescent light fixtures, thermostats, TVs and monitors, fire extinguishers, air conditioning units, speakers, lit signs, emergency fire alarms and lights, and security cameras. These items were identified throughout the stadium and in the outlying buildings.

Aboveground Storage Tanks and Hazardous Materials

As described in the 2015 Phase I Environmental Site Assessment (Appendix 4.8-1), an on-site maintenance facility is located on the southwest corner of the project site. The maintenance area stores hazardous materials, petroleum products, paints, pesticides, and herbicides for use on site. The storage containers are generally 55-gallons drums or smaller. There is also a 1,500-gallon two-compartment aboveground storage tank that stores gasoline and diesel located in the maintenance area. Two generators, each with an internal diesel reservoir (200-gallon and 50-gallon), are located on the project site. Hazardous wastes, including universal wastes and used petroleum products, are stored on the project site in the maintenance area.

Pesticides

Based on the historical use of the project site as agricultural in the early 1900s through the mid-1960s, and that the area southwest of the project site south of the San Diego River was utilized for agricultural purposes from 1985 to 2005, there is a potential for residual concentrations of pesticides to be present in shallow soil. However, soil samples collected by Group Delta did not have detected pesticides above EPA RSLs. In addition, construction of the site in the mid-1960s required fill materials to be brought in, and the site was subsequently paved. Therefore, it is unlikely that residual pesticides that may remain in shallow soils would be a concern to the project site.

4.8.1.5 Fire Hazards and Emergency Response

The northern and southern edges of the project site are located within Very High Fire Hazard Severity Zones (VHFHSZ) as mapped by the California Department of Forestry and Fire Protection and the City of San Diego Fire-Rescue Department (please see Section 4.18, Wildfire, for an analysis of the Project's relationship to VHFHSZ). The project site lies within the City of San Diego Fire-Rescue Department jurisdiction (SDFD 2009).

The City of San Diego Office of Homeland Security oversees the City's emergency prevention and protection program, mitigation and finance program, response and recovery program, and regional training program. Through these programs, the City of San Diego Office of Homeland Security supports and coordinates numerous risk management planning efforts; trains City employees; assists with the integration of emergency plans; ensures information flow to the public to assist in their emergency preparation and response; interfaces with County, state, and federal jurisdictions; maintains the City's two emergency operations centers; and secures grants from state and federal agencies related to homeland security (City of San Diego Office of Homeland Security 2017).

The City is also responsible for the development and maintenance of the emergency operational documents and guides for the existing SDCCU Stadium (City of San Diego 2018). Current SDCCU Stadium emergency response procedures and evacuation plan include procedures for evacuating the stadium as well as for emergency responses to fire, earthquake or building collapse, explosions, chemical spills, suspicious packages, bomb threats, power outages, and flooding.

4.8.1.6 Schools

No existing private or public schools serving students from pre-kindergarten through 12th grade are located within 0.25 miles of the project site. The nearest school to the project site is Juarez Elementary School at 2633 Melbourne Drive, located approximately 0.38 miles to the north. The 2019 City of San Diego Draft Mission Valley Community Plan Update shows a potential future elementary school on the project site; however, at this time, an elementary school is not proposed as part of the project.

4.8.1.7 Airports

The proposed project is located approximately 2 miles south/southeast of the Montgomery Field Airport. According to the Montgomery Field Airport Land Use Compatibility Plan (ALUCP), the project site is within the Airport Influence Area of Montgomery Field and specifically within Review Area 2 of the airport. Height limitations are the only restriction placed on land uses within Review Area 2, especially for projects located in areas of high terrain, according to the Montgomery Field ALUCP. Elevations of the project site range from approximately 50 feet to 80 feet above mean sea level (amsl), while elevations across Montgomery Field Airport range from approximately 420 feet to 430 feet amsl. Review Area 2 also includes Airspace Protection Areas and Overflight Notification Areas (San Diego County Airport Land Use Commission 2010).

4.8.2 Relevant Plans, Policies, and Ordinances

Several federal, state, and local plans, policies, and regulations control the storage, use, handling, disposal, and transport of hazardous materials and waste in order to protect public health and the environment. Additional regulations exist to protect workers on the job, and still others serve to formulate emergency and evacuation procedures. The regulations applicable to the proposed project and the regulatory agencies that provide oversight and enforcement are discussed in this section.

Federal

U.S. Environmental Protection Agency

Title 40 U.S. Code of Federal Regulations, Chapter 1, Subchapter I, Parts 260–265 – Solid Waste Disposal Act/Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act, establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 U.S. Code of Federal Regulations, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 U.S. Code of Federal Regulations, Chapter 1, Subchapter D, Part 112 – Oil Pollution Prevention

Oil Pollution Prevention regulations require the preparation of a spill prevention, control, and countermeasure plan if oil is stored in excess of 1,320 gallons in aboveground storage (or if there is a buried capacity of 42,000 gallons). Spill prevention, control, and countermeasure regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

Title 40 U.S. Code of Federal Regulations, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants and names asbestos-containing material (ACM) as one of these materials. ACM use, removal, and disposal are regulated by the EPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 42 U.S. Code of Federal Regulations, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act provides for public access to information about chemical hazards. This law and its regulations, included in Title 40 U.S. Code of Federal Regulations, Parts 350–372, establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. The EPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 U.S. Code of Federal Regulations, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act of 1976 empowers the EPA to require reporting, record keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and it also sets requirements for the use, handling, and disposal of ACM and lead-based paint (LBP) waste. As discussed above, the EPA has also established the National Emission Standards for Hazardous Air Pollutants, which govern the use, removal, and disposal of ACM as a hazardous air pollutant, mandate the removal of friable ACM before a building is demolished, and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

Regional Screening Levels

The EPA provides regional screening levels for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, DTSC HERO incorporated the EPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment Note 3, which incorporates HERO recommendations and DTSC-modified screening levels based on review of the EPA RSLs. The DTSC-modified screening level should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 U.S. Code of Federal Regulations, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage,

and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

Title 29 U.S. Code of Federal Regulations, Part 1910 et seq. – Occupational Safety and Health Standards

Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training, inventory safety equipment relevant to potential hazards, have knowledge on safety equipment use, prepare an illness prevention program, provide hazardous substance exposure warnings, prepare an emergency response plan, and prepare a fire prevention plan.

U.S. Department of Transportation

Title 49 U.S. Code of Federal Regulations, Part 172, Subchapter C – Shipping Papers

The U.S. Department of Transportation established standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests.

Federal Aviation Administration

Title 14 U.S. Code of Federal Regulations, Chapter 1, Subchapter E, Part 77 – Aeronautics and Space – Safe, Efficient Use, and Preservation of the Navigable Airspace

This regulation establishes requirements for notifying the Federal Aviation Administration (FAA) of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. For example, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

Title 14 U.S. Code of Federal Regulations, Part 99, Subpart A, Section 99.7 – Aeronautics and Space – Special Security Instructions

Pursuant to this regulation, special security instructions go into effect for aircraft operations 1 hour before the time of the event until 1 hour after the end of the event. Such operations are prohibited within 3 nautical miles up to and including 3,000 feet above ground level of stadiums having a capacity of 30,000 or more people and hosting Major League Baseball, NFL, or National Collegiate Athletic Association Division 1 games, as well as National Association for Stock Car Auto Racing Sprint Cup, Indy Car, and Champ Series races.

Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 (FEMA 2003) is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency, (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act and individual agency statutory authorities, and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

State

California Unified Program for Management of Hazardous Waste and Materials

California Health and Safety Code, Division 20, Chapter 6.11, Sections 25404–25404.9 – Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the California Environmental Protection Agency, the DTSC and Enforcement and Emergency Response Program administer the technical implementation of California’s Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC 2019). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California Health and Safety Code made by Senate Bill 1082 in 1994. The following programs make up the Unified Program:

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans [HMBPs])
- Hazardous Material Management Plans and Hazardous Material Inventory Statements
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the City of San Diego is the County DEH, Hazardous Materials Division.

Title 19 California Code of Regulations, Chapter 2, Subchapter 3, Sections 2729–2734/California Health and Safety Code, Division 20, Chapter 6.95, Sections 25500–25520

This regulation requires the preparation of an HMBP by facility operators. The HMBP identifies the hazards, storage locations, and storage quantities for each hazardous chemical stored on site. The HMBP is submitted to the CUPA for emergency planning purposes. The project site is currently subject to these requirements and there is an HMBP in place.

Hazardous Waste Management

Title 22 California Code of Regulations, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In the State of California, the DTSC regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal Resource Conservation and Recovery Act. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31, Waste Minimization, Article 1, Pollution Prevention, and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every 4 years and, as applicable, select and implement viable source reduction alternatives. This act does not apply to nontypical hazardous waste, including ACM and PCBs, among others).

Title 22 California Health and Safety Code, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal Resource Conservation and Recovery Act program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

Human Health Risk Assessment Note 3 – DTSC-Modified Screening Levels

Human Health Risk Assessment Note 3 presents recommended screening levels (derived from the EPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-modified screening level should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

Aboveground and Underground Petroleum Storage Tanks

Title 22 California Health and Safety Code, Division 20, Chapter 6.67, Sections 25270 to 25270.13 – Aboveground Petroleum Storage Act

This law applies if a facility is subject to spill prevention, control, and countermeasure regulations under Title 40 U.S. Code of Federal Regulations, Part 112, or if the facility has 10,000 gallons or more of petroleum in any or combination of aboveground storage tanks and connecting pipes. If a facility exceeds these criteria, it must prepare a spill prevention, control, and countermeasure plan.

Low-Threat Underground Storage Tank Case Closure Policy

This policy applies to petroleum UST sites subject to Chapter 6.7 of the California Health and Safety Code. This policy establishes both general and media-specific criteria. If both the general and applicable media-specific criteria are satisfied, then the LUST case is generally considered to present a low threat to human health, safety, and the environment. This policy recognizes, however, that even if all of the specified criteria in the policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the policy inappropriate.

Regional water boards and local agencies have been directed to review all cases in the petroleum UST cleanup program using the framework provided in this policy. These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in this policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site in a format acceptable to the Executive Director.

Environmental Cleanup Levels

Environmental Screening Levels

ESLs provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs are prepared by the staff of the San Francisco Bay RWQCB. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California may elect to use the ESLs; in general, the ESLs could be used at any site in the State of California, provided all stakeholders agree (SFBRWQCB 2019). Dudek's recent experience indicates that regulatory agencies in the San Diego region use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to an LUST; those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

California Integrated Waste Management Board

Title 14 California Code of Regulations, Division 7, Chapter 8.2 – Electronic Waste Recovery and Recycling Act of 2003

This regulation sets requirements regarding the use and disposal of hazardous substances in electronics. When discarded, the DTSC considers the following materials manufactured before 2006 to be hazardous waste: cathode ray tube devices, liquid-crystal display (LCD) desktop monitors, laptop computers with LCD displays, LCD televisions, plasma televisions, and portable DVD Players with LCD screens.

California Department of Transportation/California Highway Patrol

Title 13 California Code of Regulations, Division 2, Chapter 6

California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and the California Department of Transportation have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakages and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. The California Department of Transportation has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

Occupational Safety and Health

Title 8 California Code of Regulations – Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the California Code of Regulations. CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that material safety data sheets be available to employees and that employee information and training programs be documented.

In Division 1, Chapter 4, Subchapter 4, Construction Safety Orders, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

CalOSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations (8 CCR 1529). Only a CalOSHA-Certified Asbestos Consultant can provide asbestos consulting (as defined by the Business and Professions Code, 7180–7189.7, and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in construction projects and to perform lead-related construction work in an effective and safe manner.

California Building Standards Commission

Title 24 California Code of Regulations – California Building Standards Code

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the California Building Standards Code contains requirements regarding the storage and handling of hazardous materials. The chief building official at the local government level (i.e., the City) must inspect and verify compliance with these requirements prior to issuance of an occupancy permit.

California Building Code – Chapter 7A

This chapter of the California Building Standards Code establishes minimum standards for buildings located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire.

California Forestry and Fire Protection

2010 Strategic Fire Plan for California

California Public Resources Code, Sections 4114 and 4130, authorize the State Board of Forestry to establish a fire plan that establishes the levels of statewide fire protection services for State Responsibility Area lands. These levels of service recognize other fire protection resources at the federal and local level that collectively provide a regional and statewide emergency response capability. In addition, California's integrated mutual aid fire protection system provides fire protection services through automatic and mutual aid agreements for fire incidents across all ownerships. The California fire plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health.

California State Fire Marshal

Title 19 California Code of Regulations, Division 1, Chapter 10 – Explosives

This regulation addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local fire chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained in Chapter 10 of Title 19.

California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, CHP, RWQCBs, air quality management districts, and county disaster response offices.

California Accidental Release Prevention Program

Similar to the EPA Risk Management Program, the CalARP Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit an HMBP to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is further required to specify applicability of other state regulatory programs. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act amendments.

Local

Because SDSU is a component of the California State University (CSU), which is a state agency, the proposed project is not subject to local government planning and land use plans, policies, or regulations. However, for informational purposes, SDSU has considered the following planning documents and the project's site location within, and relationship to, each. The proposed project would be subject to federal and state agency planning documents described above, but would not be subject to regional or local planning documents such as the City's General Plan, Mission Valley Community Plan, or City municipal zoning code. However, for informational purposes, the proposed project has considered local planning documents.

Asbestos and Air Quality

Regulation XI, Subpart M – National Emission Standards for Asbestos, Rule 361.145 – Standard for Demolition and Renovation

The San Diego Air Pollution Control District requires that the proponent of a proposed demolition or renovation project submit an asbestos demolition or renovation operational plan (notice of intention) at least 10 days prior to the onset of any asbestos stripping or removal work. It should be noted that the notice of intention is required for all demolition projects, regardless of the presence of asbestos.

Airport Land Use Compatibility

Montgomery Field Airport Land Use Compatibility Plan

As further described in Section 4.10, Land Use and Planning, the County Airport Land Use Commission's ALUCPs serve to promote compatibility between airports and the land uses around them. ALUCPs are required to review land use plans, development proposals, and certain airport development plans for their consistency with the land use compatibility plan (San Diego County Airport Land Use Commission 2010). In the case of the proposed project, the applicable plan is the Montgomery Field ALUCP.

San Diego County Emergency Services

2018 Unified San Diego County Emergency Services Organization and County of San Diego Emergency Operations Plan

The Emergency Operations Plan includes a comprehensive emergency management system that provides planned response in disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. The plan also describes tasks and overall responsibilities for protecting life and property and identifies sources of outside support. The plan is for use by the County and its cities to respond to major emergencies and disasters (Unified San Diego County Emergency Services Organization 2018).

City of San Diego Urban Development and Safety

2008 City of San Diego General Plan – Public Facilities, Services, and Safety Element

The City of San Diego General Plan includes goals and policies related to the City's disaster preparedness program, which focuses on the prevention of, response to, and recovery from natural, technological, and human-made disasters (City of San Diego 2018). The City's disaster preparedness efforts include oversight of the City's emergency operations center, and the City participates in the County's Multi-Jurisdictional Hazard Mitigation Plan, which identifies risks posed by both natural and human-made disasters. The City is also responsible for development and maintenance of emergency operational documents for the existing SDCCU Stadium.

2015 City of San Diego Land Development Manual, Project Submittal Requirements, Section 3 – Construction Permits – Grading and Public Right-of-Way

This section of the City's Land Development Manual applies to construction permit applications for grading on private property, as well as to the construction, reconstruction, or repair of improvements within the public right-of-way. City guidelines for obtaining grading permits and public right-of-way permits are incorporated into the Land Development Manual, and, depending on the characteristics of the Project and project site, the permittee may be required to provide a grading plan, construction plan, geotechnical study, drainage study, water quality study, traffic control plan, and structural calculations. In general, this review is a ministerial process whereby approval is granted if the regulations are met.

San Diego Municipal Code, Chapter 5: Public Safety, Morals, and Welfare, Article 5: Fire Protection and Prevention

Chapter 5, Article 5 of the City of San Diego Municipal Code (referred to as the Fire Code) includes portions of the California Fire Code and IFC. As of January 1, 2014, the City of San Diego adopted the 2013 California Codes and its referenced standards. However, local amendments to the 2013 edition of the California Fire Code are currently under review and have not yet been adopted.

San Diego Municipal Code, Chapter 5: Public Safety, Morals, and Welfare, Article 3: Firearms, Dangerous Weapons, Explosives, and Hazardous Trades, Sections 53.01 and 53.01.1

An explosives permit from the City fire chief is typically obtained when blasting would occur (also under California Health and Safety Code, Section 12101).

4.8.3 Significance Criteria

The significance criteria used to evaluate the Project impacts related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous material would occur if the Project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as result, would it create a significant hazard to the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

4.8.4 Impacts Analysis

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Demolition and Construction

Hazardous materials that may be used during construction and demolition activities of the proposed project include gasoline, diesel fuel, oil, lubricants, grease, welding gases (e.g., acetylene, oxygen, and argon), solvents, paints, and explosives. These materials would be used and stored in designated construction staging areas within the boundaries of the project site and would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations. The use of these materials for their intended purpose would not pose a significant risk to the public or environment. Hazardous wastes accumulated during Project construction may include unused or off-specification paint and primer, paint thinner, solvents, and vehicle- and equipment maintenance-related materials, many of which can be recycled. Empty containers for such materials (e.g., drums and totes) may also be returned to vendors, if possible. Hazardous waste that cannot be recycled would be transported by a licensed hazardous waste hauler using a Uniform Hazardous Waste Manifest and disposed of at an appropriately permitted facility. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

Given the age of the current stadium (built in 1967) and information provided in the Asbestos, Lead-Based Paint, and Universal Waste Survey report prepared for the proposed project (Appendix 4.8-4), ACM, LBP, and universal wastes (some potentially containing PCBs) are present in the existing stadium and associated structures, and would be disturbed during the demolition process. In addition, as discussed in the Hazardous Materials Technical Report (Appendix 4.8-2), it is also possible that PCB-containing materials are present in existing electrical equipment in several electrical rooms in the stadium. Additionally, remaining hazardous materials and hazardous wastes associated with site maintenance, including aboveground storage tanks, would be disturbed during the demolition process if not removed. Due to the potential to encounter asbestos, ACM, LBP, universal wastes, hazardous materials, and PCB-containing items during the demolition process, the proposed project has the potential to create a significant hazard to the public or the environment through the routine transport or disposal of hazardous materials (**Impact HAZ-1**).

Demolition would include abatement of the existing stadium and outlying buildings for positive asbestos- and lead-containing materials, PCB-containing items, universal wastes, and other hazardous materials in accordance with mitigation measure (**MM**) **HAZ-1**. Once abated, the existing stadium would be prepared for demolition, which may include implosion. Implosion would be initiated through the detonation of explosive materials in one coordinated event. Implosion methods use highly specialized explosives to undermine the supports of a structure so it collapses either within its own footprint or in a predetermined path. The use of explosives on the project site would create a significant hazard to the public due to noise, dust, and potential debris impacts (**Impact HAZ-2**). Demolition and implosion of the existing stadium would follow a demolition plan in accordance with **MM-HAZ-2**. After demolition, the remaining materials would be sorted for reuse, recycling, and landfill disposal. Materials to be hauled off the project site would be transported in accordance with local, state, and federal laws and regulations. Identification, management, and disposal of previously unidentified hazardous materials, wastes, and tanks, should they be encountered, would be discussed in a hazardous materials contingency plan (HMCP), which would be developed prior to demolition and construction in accordance with **MM-HAZ-3**.

The Group Delta environmental investigation identified arsenic in soil in one location slightly above the published background concentration of 12 mg/kg for Southern California (Chernoff et al. n.d.). The detection of 12.1 mg/kg was identified in surface soils in the northeastern portion of the project site. Out of 12 samples collected, 10 had detections of arsenic, and 1 had an arsenic concentration above background. The average arsenic concentration in the soil samples was 5.2 mg/kg, and the 95% upper confidence limit of the detected concentrations was also below the background concentration of 12 mg/kg, indicating that the prevalence of arsenic in soil above background concentrations is low (Appendix 4.8-3). Due to regional concentrations of arsenic, applicable regulatory screening levels are almost always exceeded. Therefore, regulators have generally accepted background levels of arsenic as appropriate screening criteria (Duverge 2011). Based on Group Delta's analysis and conclusions, the arsenic detected on the project site is likely representative of background concentrations. As the detected arsenic is representative of background concentrations, no arsenic-focused remediation is required to remove arsenic from the project site; therefore, no impact would occur.

Operation

The operational phase of the proposed project would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Proposed ~~P~~project campus facilities could necessitate the routine transport, use, storage or disposal of hazardous materials associated with scientific research and would be guided by SDSU's current environmental health and safety protocol and procedures to ensure safe handling, storage, and disposal of such

materials and chemicals. Although the Project would introduce commercially available potentially hazardous materials to future residents, employees, and visitors of the project site, the use of these substances would be subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. Therefore, impacts would be **less than significant**.

As discussed in the previous section above, arsenic in the soil is likely representative of background concentrations which is common in the San Diego area and not regarded as a hazard necessitating specific attention or remediation. Therefore, once operational, any exposure of residents, employees or visitors to the site to arsenic-laden soil would be **less than significant**.

Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Demolition and Construction

As discussed above, the proposed project has the potential to expose the public and the environment to hazards associated with on-site releases of hazardous materials including ACM, LBP, PCB-containing items, universal wastes, and other hazardous materials and wastes present in the existing SDCCU Stadium and outlying buildings (**Impact HAZ-1**). Management of hazardous materials and waste during pre-demolition surveys and abatement activities would be addressed by **MM-HAZ-1**.

During construction, excavation for a below-grade parking structure and grading of surface soils would occur. Based on the findings of previous environmental investigations, as discussed in Section 4.8.1.4, there is a potential that contaminated soil, groundwater, and soil vapor is present on the project site. In the event that these contaminated media are disturbed during construction, a significant hazard to the public or environment could occur should these materials be released (**Impact HAZ-3**). To avoid upset and accident conditions by disturbance and release of contaminated media, an HMCP would be completed and followed in accordance with **MM-HAZ-3**.

The remaining ethanol contamination caused by the April 2013 tanker rollover was closed by the County DEH, stating “the present land use for the site is commercial. Changes to this land use may require reassessment of the property to determine if the revised land use could result in a risk to public health” (DEH 2014). This condition potentially requires additional assessment to determine public health risks if the project site is developed for residential land use. The HMCP that will be completed and followed in accordance with **MM-HAZ-3** would address potential impacts in soil, soil vapor, and groundwater from releases on or near the project site.

As discussed in Section 4.8.1.4, numerous environmental wells were installed on the project site for the purpose of investigating, remediating, and monitoring impacts from the MVT facility. Most of these wells were authorized to be decommissioned and destroyed by the RWQCB. Five wells, four of which remain on the project site, were ordered to remain in order to continue to evaluate the effectiveness of remedial methods under Addendum No. 8 of CAO 92-01. These four wells, as shown on Figure 4.8-1, are not to be removed or disturbed without authorization of RWQCB. Removal, damage, or disturbance of these or any other remaining wells could create an upset or accident condition (**Impact HAZ-4**). A decommissioning and destruction plan for the four sentinel wells would be prepared and approved by RWQCB, which may also require protection or replacement of the wells, and the plan would be followed, in accordance with **MM-HAZ-4**, prior to construction activities which could disturb the wells. As to all additional wells identified on site, decommissioning and destruction or transfer of these wells is assumed to be approved by RWQCB under Addendum No. 8 of CAO 92-01; a similar decommissioning and destruction plan would be prepared and approved in accordance with **MM-HAZ-5**, and wells would be properly decommissioned and destroyed or abandoned in accordance with applicable laws and regulations.

A 10-inch-diameter underground pipeline used to transmit fuel products from the MVT facility to the San Diego Harbor traverses the eastern portion of the project site from north to south. This active pipeline is located along the eastern boundary of the project site. Excavation and construction activities in the area near this pipeline have the potential to damage the pipeline, creating an accident condition that would release hazardous materials to the environment (**Impact HAZ-5**). Kinder Morgan Energy Partners would be consulted prior to commencement of construction, demolition, and implosion activities in accordance with **MM-HAZ-6** to ensure that a plan and necessary precautions are developed and implemented to avoid damage to the pipeline. Thus, any potential hazardous materials encountered on site during demolition and construction activities would be **less than significant with mitigation incorporated**.

Operation

Once operational, the proposed project would not be expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The ~~P~~project involves a new campus, including stadium, ~~campus~~, housing, commercial, and recreational facilities, with associated landscape and facility maintenance. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the ~~P~~project would introduce residential units to the project site, resulting in an increased use of commercially available potentially hazardous materials, the use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

As discussed in Section 4.8.1.4, the Group Delta investigation identified the presence of VOCs and gasoline range hydrocarbons in soil gas; Benzene, ethylbenzene, and methyl tert-butyl ether were detected in soil gas at concentrations above EPA VISLs. As operation of the proposed project would introduce residential housing and public use spaces onto the project site, the presence of this soil vapor contamination would create a potential release of hazardous materials to the environment, specifically indoor air (**Impact HAZ-6**). Construction and operation of the new buildings would include vapor mitigation measures in accordance with **MM-HAZ-7**. In addition, the Group Delta investigation collected three groundwater samples and identified diesel contamination in one of the samples at a maximum concentration of 240 µg/L. The report stated “there are no State or Federal maximum contaminant levels for TPH-DRO.” However, this concentration is slightly above the Tier 1 ESL of 100 µg/L for residential use. The ESLs are commonly used screening levels for petroleum hydrocarbons in groundwater in the State of California. Dudek’s recent experience indicates that ESLs are used by the San Diego DEH for screening level–evaluation of impacts to soil and groundwater. Therefore, the diesel contamination identified on site is higher than the San Francisco Bay RWQCB Tier 1 RSL, therefore a **significant impact would occur (Impact HAZ-7)**. Further assessment and evaluation of the diesel contamination in groundwater would be required in accordance with **MM-HAZ-3**.

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No existing private or public schools serving students from pre-kindergarten through 12th grade are located within 0.25 miles of the project site. The closest school in close proximity to the project site is Juarez Elementary School at 2633 Melbourne Drive, located approximately 0.38 miles to the north. The Draft Mission Valley Community Plan Update shows a potential future elementary school on the project site; however, at this time, an elementary school is not proposed as part of the Project. Therefore, there are **no impacts**.

Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction and Operation

The project site is not listed on a Cortese List database pursuant to Government Code Section 65962.5. However, as a result of the environmental releases discussed in Section 4.8.1.4, and summarized in the previous reports (Appendices 4.8-1 through 4.8-3), the project site and adjoining properties have been identified on other environmental databases that identify contamination on the project site (e.g., conditionally closed LUST, RWQCB groundwater cleanup). These specific listings are discussed in the referenced appendices. As discussed in Section 4.8.1.4, the following impacts on the project site are associated with these hazardous materials sites:

- There is potential for contaminated soil, groundwater, and soil vapor to be present on the project site due to multiple former release incidents; this could be disturbed during construction activities (**Impact HAZ-3**).
- Five groundwater monitoring wells, four of which are on the project site, are under order to remain in place in order to continue to evaluate the effectiveness of remedial methods under Addendum No. 8 of CAO 92-01. Additionally, other wells on the project site associated with off-site impacts have been ordered to be destroyed under Addendum No. 8 of CAO 92-01, but have not yet been decommissioned and/or destroyed. Removal, damage, or disturbance of these monitoring wells could create an upset or accident condition (**Impact HAZ-4**).
- Soil vapor contamination, specifically gasoline range hydrocarbons and VOCs, is present on the project site above EPA VISLs. As operation of the proposed project would introduce residential housing and public use spaces onto the project site, the presence of this soil vapor contamination would create a potential release of hazardous materials to indoor air (**Impact HAZ-6**).
- Diesel contamination was found in one of three groundwater samples above the residential Tier 1 ESL of 100 µg/L. As operation of the proposed project would introduce residential housing onto the project site, the presence of this groundwater contamination would create a potential exposure of the public to hazardous materials (**Impact HAZ-7**).

As discussed in Section 4.8.6, mitigation measures **MM-HAZ-3**, **MM-HAZ-4**, **MM-HAZ-5**, and **MM-HAZ-7** would be followed, and these hazards would be reduced to **less than significant with mitigation incorporated**.

For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Construction and Operation

The proposed project is located approximately 2 miles south/southeast of the Montgomery Field Airport. According to the Montgomery Field ALUCP, the project site is within the Airport Influence Area of Montgomery Field and specifically within Review Area 2 of the airport. The Montgomery Field ALUCP places height limitations on land uses within Review Area 2, especially for projects located in areas of high terrain. Elevations of the project site range from approximately 50 feet to 80 feet amsl, while elevations across Montgomery Field Airport range from approximately 420 feet to 430 feet amsl. Although the project site is within the Montgomery Field Airport Influence Area, the project's proposed land uses would be compatible with the Montgomery Field ALUCP, as discussed in Section 4.10. Additionally, the proposed project is located outside of the noise contour boundaries for Montgomery Field.

Review Area 2 includes Airspace Protection Areas and Overflight Notification Areas. A portion of the project site is located within the Overflight Notification Area, and because the project would entail a residential component, CSU/SDSU or its designee is required to file an overflight notification document with the FAA. Further, the ALUCP for Montgomery Field Airport includes two types of Airspace Protection Surfaces: the FAA Height Notification Boundary and Part 77 Airspace Surfaces (discussed previously in the Section 4.8.2, Regulatory Framework portion of this EIR section). The proposed project is located within both zones. CSU/SDSU or its designee is required to file notifications with the FAA when construction or alteration exceeds 200 feet above ground level and/or exceeds an imaginary surface extending outward and upward at defined slopes.

Because the project could result in buildings in excess of 200 feet in height, a **significant impact would occur**. SDSU would be required to notify the FAA of both the new residential buildings (some of which are anticipated to reach heights in excess of 200 feet above ground level) and the anticipated temporary use of construction cranes, which may be used during construction of the stadium and campus/residential buildings. In addition to FAA notifications of the proposed project, the FAA restricts aircraft operations within the vicinity of stadiums exceeding a capacity of 30,000 people during National Collegiate Athletic Association Division I football games (NCAA 2019).

Upon filing with the FAA, the proposed project would be required to receive a Determination of No Hazard to Air Navigation to comply with the applicable FAA regulations. In the event the FAA does not issue their approval via this determination (**Impact HAZ-8**), an alternative plan for the proposed project and/or alternative construction equipment should be considered, and notifications with the FAA should be refiled (**MM-HAZ-8**).

Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction

Demolition of the existing SDCCU Stadium and construction of the new stadium and other buildings and facilities would be performed in accordance with the applicable standards, codes, and regulations pertaining to emergency response and evacuation planning, including the Office of Homeland Security Emergency Operations Plan. Therefore, there would be no interference with an adopted emergency response plan or evacuation plan, and **no impacts** would occur.

Operation

Due to the proposed change in land use from an existing stadium facility to a campus, including innovation and residential districts and stadium uses, the proposed project would have the potential to conflict with existing emergency response and evacuation plans. Inconsistencies between existing emergency response and evacuation plans and the proposed project would represent a **significant impact (Impact HAZ-9)**. As required by mitigation measure **MM-HAZ-9**, CSU/SDSU or its designee shall coordinate with the City and County to update plans pertaining to emergency response and evacuation procedures to reflect the new location and design of the new stadium and addition of other proposed project buildings and facilities. See also Section 4.18 for discussion of emergency evacuation plans.

Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Official City of San Diego Fire-Rescue Department mapping of VHFHSZ throughout the City indicates that portions of the northern and southern areas of the project site would be located in a VHFHSZ (see Figure 4.18-2, Fire Hazard Severity Zones, in Section 4.18). A full discussion of the project's relationship to wildland fire hazards is outlined in Section 4.18.

Would the project result in a cumulative impact to hazards and hazardous materials?

For cumulative analysis, the hazardous materials geographic scope is generally restricted to the area immediately surrounding the project site as the potential for risk is limited to the area immediately surrounding an affected hazardous material site or risk generator. However, other topics associated with human health and safety such as transportation of hazardous materials, wildfire, or airport safety can expand through the surrounding region.

As described above, there are a variety of hazardous material and public health and safety issues that are relevant and applicable to the project site and proposed project. Many potential impacts related to hazardous materials and public health and safety risks would be minimized due to compliance with federal, state, and local regulatory requirements. These legal requirements and regulations, as detailed in Section 4.8.2, minimize potential for health and safety risks.

Cumulative projects would also be subject to federal, state, and local regulations related to hazardous materials and other public health and safety issues. In a manner similar to the proposed project, adherence to these regulatory requirements would reduce incremental impacts associated with public exposure to health and safety hazards in each of the affected project areas. For example, the Union Tribune Mixed Use Project EIR (City of San Diego 2015) and Camino Del Rio Mixed Use Project EIR (City of San Diego 2014) both identified no impacts or less-than-significant impacts to health and safety with the adherence to regulatory requirements. Additionally, most hazardous material and safety-related risks are localized, generally affecting a specific site and immediate surrounding area, thus minimizing the potential for an impact to combine with another project to create a cumulative scenario.

As the proposed project would be in a VHFHSZ, the Project would be subject to construction requirements for buildings within these zones. (Refer to EIR Section 4.18, Wildfire, for additional information.) Cumulative projects would be subject to these same requirements, on both a state and local level. As adherence to these requirements makes the proposed project impacts less than significant, these same requirements would reduce the risk on a cumulative level, thereby reducing cumulative impacts.

Because cumulative projects would be fully regulated, thus reducing potential for public safety risks, cumulative impacts associated with exposure to hazards and hazardous materials would be less than significant. Through mitigation and compliance with regulatory requirements, the construction or operation of the proposed project itself would not create significant human or environmental health or safety risks that could combine with other project impacts to create a significant and cumulatively considerable impact. For these reasons, the proposed project **would not result in cumulatively considerable impacts** related to hazards and hazardous materials.

4.8.5 Summary of Impacts Prior to Mitigation

- Impact HAZ-1** Demolition, implosion, and construction activities have the potential to disturb ACM, LBP, PCB-containing items, universal wastes, and remaining hazardous materials and hazardous wastes in existing building materials on the project site. A significant impact to the public or the environment due to routine disposal, transport, and/or release of hazardous materials would occur. Therefore, mitigation is provided (Section 4.8.6, Mitigation Measures, **MM-HAZ-1**).
- Impact HAZ-2** The use of explosives during demolition and implosion activities on the project site would create noise, dust, and potential debris. A significant impact to the public or environment would occur due to routine use of hazardous materials. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-2**).
- Impact HAZ-3** Contaminated soil, groundwater, and soil vapor may be present on the project site. Construction and operation activities would potentially disturb these materials. A significant impact to the public or the environment due to accidental release of hazardous material would occur. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-3**).
- Impact HAZ-4** Environmental monitoring wells are located on the project site which were installed and monitored under RWQCB CAO 92-01. Damage, destruction, or removal without proper procedure or authorization would violate CAO 92-01 and potentially release hazardous materials to the environment. A significant impact to the public or the environment due to accidental release of hazardous materials would occur. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-4 and MM-HAZ-5**).
- Impact HAZ-5** A 10-inch-diameter active underground fuel transportation pipeline traverses the eastern portion of the project site. Excavation and construction activities in the area near this pipeline have the potential to damage the pipeline. A significant impact to the public or environment due to a release of hazardous materials would occur. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-6**).
- Impact HAZ-6** Soil vapor contamination, specifically benzene, ethylbenzene, and methyl tert-butyl ether, is present on the project site above EPA VISLs. As operation of the proposed project would introduce residential housing and public use spaces onto the project site, a significant impact to the public due to the presence of this soil vapor contamination would occur. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-7**).
- Impact HAZ-7** Diesel contamination was identified in groundwater that is above the Tier 1 ESL for residential use. As operation of the proposed project would introduce residential housing onto the project site, a significant impact to the public due to the presence of this contamination would occur. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-3**).
- Impact HAZ-8** In the event the FAA does not issue their Determination of No Hazard to Air Navigation, the proposed project would be in violation of applicable FAA regulations. A significant impact due to a safety hazard or excessive noise for people residing or working in the project area would occur. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-8**).
- Impact HAZ-9** The proposed project would conflict with existing emergency response and evacuation plans. A significant impact to implementation of an emergency response plan or emergency evacuation plan would occur. Therefore, mitigation is provided (Section 4.8.6, **MM-HAZ-9**).

4.8.6 Mitigation Measures

The following mitigation measures would be implemented to reduce all impacts described in Section 4.8.5 to levels below significance.

- MM-HAZ-1 Pre-Demolition Hazardous Materials Abatement.** Demolition or renovation plans and contract specifications shall incorporate abatement procedures for the removal of materials containing asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, and universal waste items, including decommissioning and removal of aboveground storage tanks and drums. All abatement work shall be done in accordance with federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.
- MM-HAZ-2 Demolition and Implosion Plan.** Prior to demolition of the existing San Diego County Credit Union Stadium, a Demolition (and Implosion) Plan shall be prepared and submitted to City of San Diego Fire-Rescue Department Fire Prevention Bureau for review. The plan shall include the following, at a minimum:
- Project-specific demolition methods and explosives.
 - Dust mitigation and monitoring.
 - Noise mitigation.
 - Enforcement of a human safety standoff distance of approximately 1,000 feet during the implosion.
- MM-HAZ-3 Hazardous Materials Contingency Plan.** Prior to commencement of any demolition or construction activities, a Hazardous Materials Contingency Plan (HMCP) shall be developed that addresses potential impacts in soil, soil vapor, and groundwater from releases on or near the project site, as well as the potential for existing hazardous materials on site (e.g., drums, ~~and tanks, and pipelines~~). The HMCP shall include training procedures for identification of contamination and hazardous materials/substances. The HMCP shall describe procedures for assessment, characterization, management, and disposal of hazardous constituents, materials, and wastes, and notification and decommissioning procedures for tanks, in accordance with all applicable state and local regulations. Contaminated soils and/or groundwater shall be managed and disposed of in accordance with local and state regulations. The HMCP shall include health and safety measures, which may include but are not limited to periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities. California State University/San Diego State University or its designee shall implement the HMCP during construction activities for the proposed project. The HMCP shall be submitted to the County of San Diego Department of Environmental Health for review.
- MM-HAZ-4 Sentinel Well Decommissioning/Protection.** The four sentinel wells on the project site ordered to remain under Addendum No. 8 of CAO 92-01 may require removal, protection, or replacement. A well decommissioning and destruction plan shall be prepared for the management of the monitoring wells. The decommissioning and destruction plan, which may also include protection and/or replacement, would be written in accordance with applicable state and local laws and

submitted to the Regional Water Quality Control Board for approval. The approved plan shall be followed and on-site wells would be removed or protection measures emplaced prior to construction in accordance with applicable laws and regulations.

- MM-HAZ-5 Well Decommissioning, Other Wells.** Other wells identified on the project site related to the former Mission Valley Terminal contamination plume are assumed approved for removal or transfer by the Regional Water Quality Control Board under Addendum No. 8 of CAO 92-01. A well decommissioning and destruction plan shall be prepared for the removal or abandonment of on-site environmental wells, groundwater monitoring wells, remediation wells, and associated piping. The decommissioning and destruction plan shall be written in accordance with applicable regulations and submitted to the Regional Water Quality Control Board for approval. The approved plan shall be followed and on-site wells would be removed, transferred, or abandoned prior to construction in accordance with applicable laws and regulations.
- MM-HAZ-6 Safety of Fuel Pipeline.** Kinder Morgan Energy Partners shall be consulted prior to commencement of construction, demolition, and implosion activities to ensure safety and to avoid damage of the 10-inch-diameter fuel pipeline. San Diego State University and Kinder Morgan Energy Partners shall determine appropriate setbacks, safety measures, and procedures that will be put in place to avoid conflict with the fuel pipeline in accordance with all applicable state and local regulations.
- MM-HAZ-7 Vapor Mitigation.** Prior to commencement of vertical construction of each residential, educational, and commercial building at the project site, San Diego State University or its designee shall conduct a soil vapor investigation within the proposed building footprint. If soil vapor is detected within the footprint of a proposed building or enclosed structure, vapor mitigation measures shall be implemented in accordance with the Department of Toxic Substances Control Vapor Intrusion Mitigation Advisory for all such future buildings and enclosed structures. The construction contractor shall develop vapor mitigation measures that adequately mitigate potential vapor intrusion in buildings and enclosed structures on the project site. ~~Typical vapor mitigation systems comprise of a sub-slab geomembrane or vapor barrier installed throughout the entire footprint of the building. Sub-slab ventilation piping is installed below the geomembrane layer for capturing VOCs in the soil gas and discharging them above the building roof through vent stacks. Optional blowers can be connected to the vent piping at the roofline for conversion of a passive venting system into an active system, if necessary. Operation of the project shall maintain functionality of these features as required to continue protection from vapor intrusion.~~
- MM-HAZ-8 Obtain FAA Determination of No Hazard to Air Navigation.** Upon finalization of the proposed project design and site and grading plans, Notices of Proposed Construction or Alteration with the FAA (FAA Form 7460-1) shall be filed due to the proposed project's proximity to Montgomery Field Airport, the policies of the Montgomery Field Airport Land Use Compatibility Plan, and the anticipated maximum heights of the proposed stadium and construction equipment. Proposed Project development shall not proceed until a Determination of No Hazard to Air Navigation is made by the FAA.
- MM-HAZ-9 Emergency Response and Evacuation Planning.** Plans and policies pertaining to emergency response and evacuation procedures shall be updated to reflect the location and design of the new stadium, new buildings, and other proposed project features. San Diego State University or its designee shall submit plans to the City of San Diego Fire-Rescue Department Fire Prevention Bureau and Unified San Diego County Emergency Services Organization for review. Plans shall

include, but not be limited to, maps of evacuation routes for both pedestrians and vehicle traffic; locations of hospitals, fire stations, and police stations; locations of fire extinguishers; and designation of responsible personnel and agencies. To the extent feasible, California State University/San Diego State University or its designee shall consult the U.S. Department of Homeland Security's Evacuation Planning Guide for Stadiums and implement measures recommended therein, as necessary.

4.8.7 Level of Significance After Mitigation

4.8.7.1 Routine Transport, Use, or Disposal of Hazardous Materials

The abatement of hazardous materials identified on the project site would remove the potential for exposure of the public and the environment to accidental release of hazardous materials (**MM-HAZ-1**). Additionally, these materials would be removed, handled, and transported in accordance with applicable laws and regulations, removing the potential for exposure due to routine handling and transport. Demolition plans and contract specifications would incorporate any necessary abatement measures in compliance with all applicable federal and state regulations, and would be submitted to the City of San Diego Fire-Rescue Department Fire Prevention Bureau for review (**MM-HAZ-2**). Therefore, with the implementation of **MM-HAZ-1** and **MM-HAZ-2**, impacts associated with the transport, use, or disposal of hazardous waste and materials during demolition and construction would be mitigated to a **less-than-significant** level.

4.8.7.2 Upset and Accident Conditions

Construction and demolition activities would be completed in accordance with the HMCP (**MM-HAZ-3**), which would put procedures in place to identify, manage, properly transport, and dispose of hazardous substances and materials identified or encountered on site as a result of environmental contamination. A well decommissioning and destruction plan, which may include procedures for protection and/or replacement of the four wells to remain under Addendum No. 8 of CAO 92-01, would be in place, as approved by RWQCB, to properly manage, decommission, and/or destroy these four on-site monitoring wells (**MM-HAZ-4**), and a separate plan would be developed for any other environmental wells identified on the project site (**MM-HAZ-5**). Kinder Morgan Energy Partners will be consulted as to the proper safety techniques to avoid damage to the fuel pipeline (**MM-HAZ-6**). With implementation of **MM-HAZ-3** through **MM-HAZ-6**, impacts associated with the foreseeable accident and upset conditions involving a release of hazardous materials to the environment during construction would be mitigated to a **less-than-significant** level.

Implementation of vapor mitigation measures would be required by **MM-HAZ-7** for future residential, educational, and commercial buildings and enclosed structures in accordance with DTSC vapor intrusion protection guidelines (DTSC 2011). Implementation of **MM-HAZ-7** would mitigate the foreseeable accident and upset conditions involving a release of hazardous materials to the environment during operation to a **less-than-significant** level.

4.8.7.3 Safety Hazard or Excessive Noise from Airport

Receipt of a Determination of No Hazard to Air Navigation would be required by **MM-HAZ-8** to ensure compliance with FAA regulations. Upon receiving this determination, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area and impacts would be **less than significant**.

4.8.7.4 Evacuation Plans

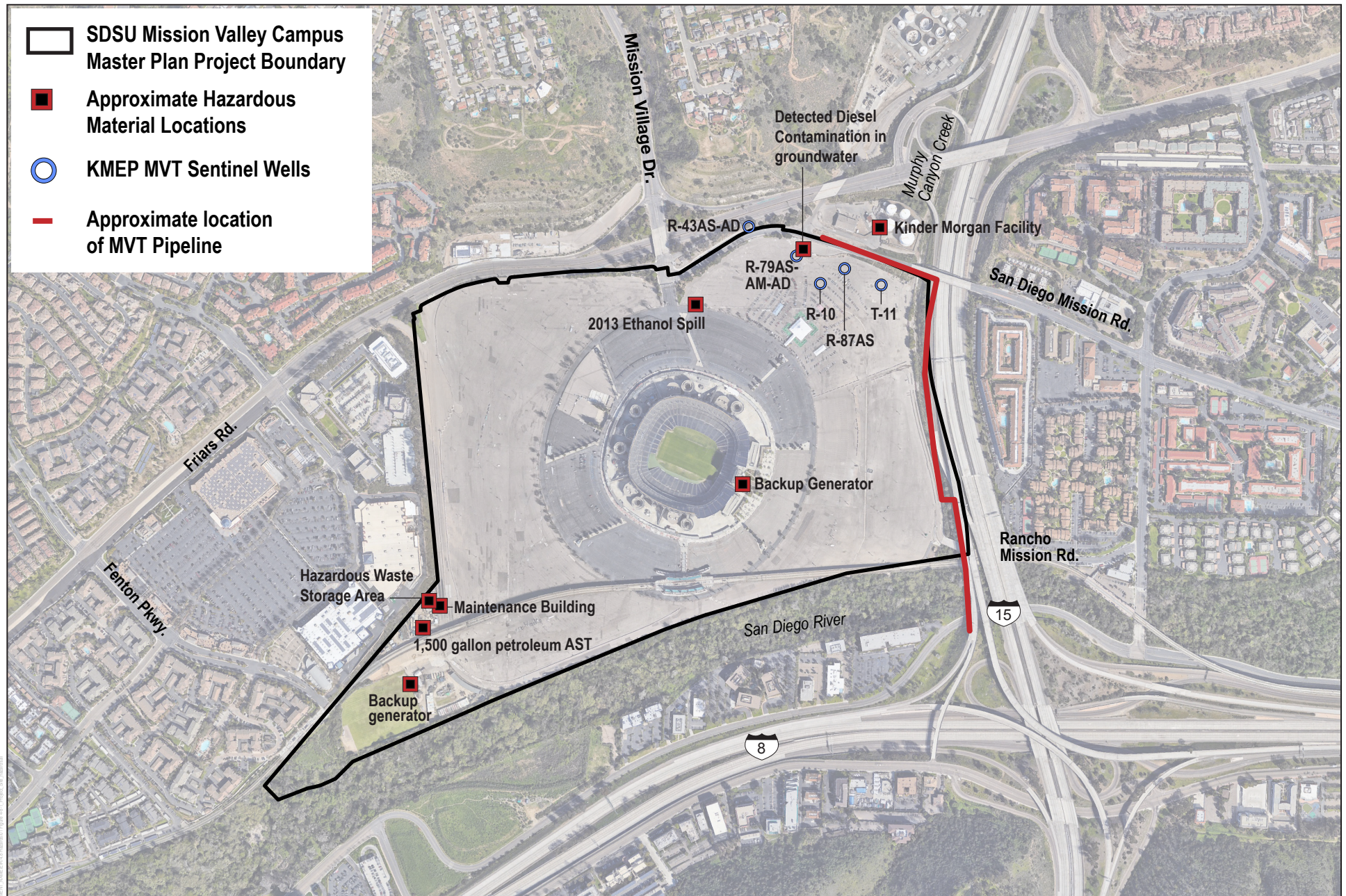
As required by **MM-HAZ-9**, CSU/SDSU or its designee shall coordinate with the City and County to update plans pertaining to emergency response and evacuation procedures to reflect the new location and design of the new stadium and addition of other proposed project buildings and facilities. Upon review of updated plans by the City of San Diego Fire-Rescue Department Fire Prevention Bureau and Unified San Diego County Emergency Services Organization, potential impacts would be mitigated to a level that is **less than significant**.

4.8.7.5 Wildfire Hazards

Anticipated impacts to wildfire risk during project construction would be potentially significant because project construction activities have the potential to generate heat or sparks that could result in wildfire ignition within a VHFHSZ (Impact WLD-2). Mitigation Measures **MM-WLD-2** and **MM-WLD-3** would ensure that emergency vehicles and evacuation traffic have adequate access in the event that fire suppression is needed during project construction, therefore reducing impacts to **less than significant**. See also Section 4.18 for further discussion.

4.8.7.6 Cumulative Impacts

Because cumulative projects would be fully regulated, thus reducing potential for public safety risks, cumulative impacts associated with exposure to hazards and hazardous materials would be less than significant. Through mitigation and compliance with regulatory requirements, the construction or operation of the proposed project itself would not create significant human or environmental health or safety risks that could combine with other project impacts to create a significant and cumulatively considerable impact. For these reasons, the proposed project **would not result in cumulatively considerable impacts** related to hazards and hazardous materials.



SOURCES: AECOM 2015, ARCADIS 2015, SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD. 2016

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